

Exhibit B

Michael Lee (ML 6353)
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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAZE LTD,

Plaintiff,

v.

CHARLIE DUNCAN GREEN,

Defendant.

Case No. 1:24 Civ. 00256 (PAE)

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO DEFENDANT'S
FIRST SET OF INTERROGATORIES**

Plaintiff Jaze Ltd. ("Jaze") hereby objects and responds to Defendant Charlie Duncan Green's First Set of Interrogatories.

RESPONSES TO INTERROGATORIES

1. Identify the names and addresses of all witnesses with knowledge of information relevant to the subject matter of the action.

Response:

See Plaintiff's Initial Disclosures.

2. With respect to your claim for damages in this Action, state:

- a. the nature and amount of damages sought, by category as identified in the Complaint and in Plaintiff's Rule 26(a) initial disclosures; and
- b. the method of calculation for each category or claim of damages.

Response:

Plaintiff objects to this Interrogatory on grounds that it is compound in violation of the Federal Rules. Plaintiff further objects on grounds that it is unable to provide the amount of damages sought at this time, because as stated in its Initial Disclosures, Plaintiff anticipates that damages calculations will depend upon testimony to be developed and information to be disclosed throughout discovery.

Notwithstanding the foregoing objections, as previously disclosed, Plaintiff seeks to recover, *inter alia*, compensatory damages, punitive damages, attorneys' fees, costs, and pre-judgment interest.

3. Identify the existence, custodian, location and general description of all documents identified in the Complaint, Plaintiff's Rule 26(a) disclosures, and all other documents relevant to the subject matter of this action.

Response:

Plaintiff objects to this Interrogatory on grounds that it is compound in violation of the Federal Rules.

Notwithstanding the foregoing objection, the requested information is set forth in Plaintiff's Initial Disclosures.

4. Identify all people who provided information that was included in your responses to any of the foregoing interrogatories.

Response:

James Eagelton
Jaze Ltd.
5 Ribblesdale Place
Preston, England PR1 8BZ

5. Identify any and all copyright strikes and/or copyright claims you have received from third parties or from YouTube in connection with any of your YouTube channels from 2017 to the present.

Response:

Plaintiff objects to this Interrogatory as overly broad, burdensome, and harassing as it requests information about documents and communications from the past seven and a half years, extending well before the events that are the subject matter of this action. Plaintiff further objects to this Interrogatory as overly broad, burdensome, vague, irrelevant and harassing because it requests information that is not pertinent to the topic of this action.

LEE LAW PLLC

Dated: September 4, 2024



Michael Lee (ML6353)
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Telephone: (212) 621-8239

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be emailed to counsel of record for defendant.

Date: September 4, 2024


Michael Lee

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAZE LTD,

Plaintiff,

v.

CHARLIE DUNCAN GREEN,

Defendant.

Case No. 1:24 Civ. 00256 (PAE)

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO DEFENDANT'S
FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS**

Plaintiff Jaze Ltd. ("Jaze") hereby objects and responds to Defendant Charlie Duncan Green's First Request for Production of Documents.

RESPONSES TO DOCUMENT REQUESTS

1. All Documents referred to in Plaintiff's Rule 26(a) Initial Disclosures.

Response:

Responsive documents responsive to this request are produced herewith.

2. All Documents identified, cited to, or referred to in the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it does not adequately identify or defined specific documents sought. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation. Plaintiff further objects to this Request as compound.

Notwithstanding these objections, certain documents responsive documents are produced herewith

3. All Communications between or among Plaintiff, Defendant, and their respective representatives, officers, agents, and employees.

Response:

Plaintiff objects to this Request as calling for the production of hundreds of pages of documents as it is not limited to a specific time frame as Defendant provided no such time frame in its instructions. Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it requests documents that are not pertinent to the topic of this action. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections.

Notwithstanding the foregoing objections, Plaintiff will produce non-privileged communications concerning the subject matter of this action that are responsive to this Request.

4. All Documents which identify, show, evidence, or establish Plaintiff's income from 2017 to the present from its YouTube channel(s) "Jaze Cinema" referred to in paragraph 1 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it requests documents that are not pertinent to the topic of this action, and which contain sensitive and/or confidential information. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections.

5. All Documents which identify, show, evidence, or establish Plaintiff's income from 2017 to the present from Plaintiff's original animations for the "Friday Night at Freddy's" video game franchise referred to in paragraph 2 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it requests documents that are not pertinent to the topic of this action, and which contain sensitive and/or confidential information. Plaintiff further objects to this Request to the extent

that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections.

6. All licensing and other agreements between Plaintiff and third-party animators hired by Plaintiff referred to in paragraph 3 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome and harassing as it requests the production of hundreds of documents, a majority of which contain sensitive, proprietary and/or confidential information concerning persons and entities unrelated to this action. Plaintiff further objects to this Request as overly broad, burdensome, vague, irrelevant, and harassing because it requests documents that are not relevant to the topic of this action. Plaintiff further objects to this Request as compound.

Responsive documents are being withheld on the basis of the stated objections.

7. All licensing and other agreements between Plaintiff and third-party musicians hired by Plaintiff referred to in paragraph 3 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome and harassing as it requests the production of hundreds of documents, a majority of which contain sensitive, proprietary and/or confidential information concerning persons and entities unrelated to this action. Plaintiff

further objects to this Request as overly broad, burdensome, vague, irrelevant, and harassing because it requests documents that are not pertinent to the topic of this action.

Responsive documents are being withheld on the basis of the stated objections.

8. All Communications between Plaintiff and third-party animators and musicians referred to in paragraph 3 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome and harassing as it requests the production of thousands of documents, a majority of which contain sensitive, proprietary and/or confidential information concerning persons and entities unrelated to this action. Plaintiff further objects to this Request as overly broad, burdensome, vague, irrelevant, and harassing because it requests documents that are not pertinent to the topic of this action.

Responsive documents are being withheld on the basis of the stated objections.

9. All “Licensing Agreements” between Plaintiff and Defendant referred to in paragraphs 4 and 5 of the Complaint.

Response:

Documents responsive to this Request are produced herewith.

10. All Documents and Communications which are related to, identify, show, evidence, or establish the third-party copyright claim referred to in paragraph 6 of the Complaint.

Response:

Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it requests documents that are not pertinent to the topic of this action. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections. Notwithstanding the foregoing objections, documents responsive to this Request are produced herewith.

11. All Communications between Plaintiff and members of the musical group *The Living Tombstone*.

Response:

Plaintiff objects to this Request as it is not limited to a specific time frame, and Defendant provided no such time frame in its instructions. Plaintiff objects to this Request as overly broad, burdensome, vague and harassing because it requests documents that are not pertinent to the topic of this action.

Responsive documents are being withheld on the basis of the stated objections. Notwithstanding the foregoing objections, produced herewith are all communications between Plaintiff and members of the musical group *The Living Tombstone* pertaining to the subject matter of this action.

12. All Documents and Communications between Plaintiff and Defendant which are related to, identify, show, evidence or establish the third-party copyright claim referred to in paragraph 6 of the Complaint.

Response:

Documents responsive to this Request are produced herewith.

13. All Documents and Communications which are related to, identify, show, evidence, or establish any and all copyright claims or copyright strikes received by Plaintiff in connection with any of its YouTube channels from 2017 to the present.

Response:

Plaintiff objects to this Request as overly broad, burdensome, vague, and harassing because it requests documents that are not pertinent to the topic of this action. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections. Notwithstanding the foregoing objections, Plaintiff will produce documents responsive to this Request pertaining to the copyright claims or copyright strikes received by Plaintiff in connection with the video that is the subject matter of this action.

14. All Documents which identify, show, evidence, or establish the revenues generated by the YouTube video referred to in paragraph 33 of the Complaint.

Response:

Plaintiff objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections. Notwithstanding the foregoing objections, responsive documents are produced herewith.

15. All Documents which identify, show, evidence or establish the nature and amount of damages sought by Plaintiff in this Action and the method of calculation for each claim or category of damages.

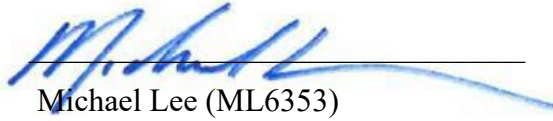
Response:

Plaintiff objects to this Request on grounds that it is unable to provide the amount of damages sought at this time, because as stated in its Initial Disclosures, Plaintiff anticipates that damages calculations will depend upon testimony to be developed and information to be disclosed throughout discovery. Plaintiff further objects to this Request to the extent that it calls for information that is subject to the attorney-client privilege, the work-product doctrine, or any other applicable privilege insofar as it seeks legal opinions, Plaintiff's communications with counsel or counsel's work product created in preparation of this litigation.

Responsive documents are being withheld on the basis of the stated objections.

LEE LAW PLLC

Dated: September 4, 2024

A handwritten signature in blue ink, appearing to read 'Michael Lee', is written over a horizontal line.

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Attorney for Plaintiff

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Date: September 4, 2024


Michael Lee